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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

JESUS ANGELES VALENCIA,

Plaintiff,

V.

TRACY RENAUD, Director, United States  
Citizenship and Immigration Services, et al.,  
ALEJANDRO MAYORKAS, Secretary of  
Homeland Security, CYNTHIA MUNITA,  
Director, U.S. Citizenship and Immigration  
Services, Seattle Field Office

Defendants.

Case No. C20-6026-RSM

STIPULATION FOR EXTENSION OF  
TIME

Note on Motion Calendar: April 29, 2021

COMES NOW, Plaintiff, Jesus Angeles Valencia, and Defendants Tracy Renaud, *et al.*, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 10(g) and 16, and hereby jointly stipulate and move for an extension of 120 days for Defendants to respond to the Complaint. Defendants' responsive pleading to the Complaint is due May 4, 2021.

A court may modify a deadline for good cause. Fed. R. Civ. P. 6(b). Continuing pretrial and trial dates is within the discretion of the trial judge. *See King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986).

The parties submit there is good cause for an extension of the deadlines. U.S. Citizenship and Immigration Services (“USCIS”) has issued a Notice of Intent to Deny (“NOID”). Plaintiff has 90 days to respond to the NOID. Once the NOID has been adjudicated, this matter might be resolved without further involvement of the Court. Continuing the existing deadline for a responsive pleading will allow the parties to conserve resources because they will not have to expend resources completing work on the case that may become moot (or the issues may change).

Therefore, the parties stipulate and agree to a 120-day extension for Defendants to respond to the Complaint. If the matter is not resolved before then, Defendants will respond to the Complaint by September 1, 2021.

Stipulated to and presented this 29th day of April, 2021.

## ALEXANDRA LOZANO IMMIGRATION LAW

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Acting United States Attorney

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*Counsel for Plaintiff*

*Counsel for Defendants*

## ORDER

The parties having stipulated and agreed, it is hereby so ORDERED.

DATED this 30<sup>th</sup> day of April, 2021.



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RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE